

# TREATED SEED TAG/BAG STATEMENTS

This document is part of the “Treated Seed Tag Initiative” discussions between CLA Seed Treatment Team and EPA.

The Treated Seed Tag Initiative has the objective to simplify and harmonize the required statements for treated seed tags or bags. **The explanation below supports the suggestion to eliminate treated seed tag statements such as:**

*“mg a.i./seed” in the use directions and seed bag tag: “if seed size is **XX** seeds/lb. (**XXY** lbs./U), **ZZ** fl oz. a.i./cwt. would provide **YY** mg a.i./seed.”*

**The suggestion is to keep the statements regarding mg of ai/seed statements only on the crop protection labels.**

## Example: Imidacloprid - 2 labels

- 1) Gaucho 600 Flowable, 48.7% of Imidacloprid for Seed treatment only, cotton.
- 2) Gaucho 550 SC Insecticide, 42.8% of Imidacloprid, foliar and soil uses for cotton.

## Total Rate calculations for cotton (only) :

- 1) ***Gaucho 600 Flowable*** – Label rate: Apply 0.375 mg of a.i./seed; or 12.8 fl. oz hundredweight of seed; or 12.8 fl. oz per 100 pounds of seed.
  - Usually 1 pound contains 6000 cotton seeds  $\Rightarrow$  12.8 fl. oz is applied to 600,000 cotton seed.
  - Cotton seed planting rate is on average 35,000 seeds/acre  $\Rightarrow$  the amount of a.i. is 0.03 lb/A.
  - If cotton seed planting rate of 85,000 seeds/ acre  $\Rightarrow$  the amount of a.i. is **0.070 lb/A.**

***Restrictions on the label:*** Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of **0.5 lb of imidacloprid per acre per cropping cycle.**

## 2) ***Gaucho 550 SC Insecticide***

**Soil application rates:** 7.4 to 9.2 fl. oz/Acre

***Restrictions on the label:*** Maximum Gaucho 550 SC allowed per year: 9.2 fl. oz/Acre (**0.33 lb a.i./A.**)

Regardless of formulation or method of application, apply no more than **0.5 lb of active ingredient per year**, including seed treatment, soil and foliar.

**Foliar application:** 0.9 to 1.7 fl.oz/Acre

**Restrictions on the label:** Maximum Gaucho 550 SC allowed per year: 8.7 fl. oz/Acre (0.31 lb a.i./A).

Regardless of formulation or method of application, apply no more than **0.5 lb of active ingredient per year**, including seed treatment, soil and foliar.

- Therefore, if a farmer is using maximum doses of Imidacloprid for cotton:

*seed treatment (0.070 lb ai /A) + max soil application (0.33 lb a.i./A) + max foliar application (0.31 lb ai/A) = amount of a.i. per year will be ≥ 0.5 lb ai/ A.*

- Farmer will need to use a lower rate for foliar or rate application to keep year amount of Imidacloprid ≤ 0.5 lb/A.

#### **Examples of different application scenarios for cotton:**

1) Seed Treatment + 1 application of the max soil rate + 5 applications of the max foliar rate

$0.07 \text{ lb/A} + 0.33 \text{ lb/ A} + 0.30 \text{ lb/A} = 0.70 \text{ lb ai/A} > \text{than max rate per year } 0.5 \text{ lb of ai/A.}$

2) Seed Treatment + 1 application of the max soil rate + 2 applications of the max foliar rate

$0.07 \text{ lb/A} + 0.33 \text{ lb/ A} + 0.12 \text{ lb/A} = 0.52 \text{ lb ai/A} > \text{than max rate per year } 0.5 \text{ lb of ai/A.}$

3) Seed Treatment + 1 application of the max soil rate + 1 application of the max foliar rate

$0.07 \text{ lb/A} + 0.33 \text{ lb/ A} + 0.06 \text{ lb/A} = 0.46 \text{ lb ai/A}$

4) Seed Treatment + 1 application of the min soil rate + 5 applications of the max foliar rate

$$0.07 \text{ lb/A} + 0.26 \text{ lb/A} + 0.30 \text{ lb/A} = 0.63 \text{ lb ai/A} > \text{than max rate per year } 0.5 \text{ lb of ai/A.}$$

5) Seed Treatment + 1 application of the min soil rate + 2 applications of the max foliar rate

$$0.07 \text{ lb/A} + 0.26 \text{ lb/A} + 0.12 \text{ lb/A} = 0.45 \text{ lb ai/A}$$

6) Seed Treatment + 1 application of the max soil rate + 3 applications of the min foliar rate

$$0.07 \text{ lb/A} + 0.33 \text{ lb/A} + 0.09 \text{ lb/A} = 0.49 \text{ lb ai/A}$$

**Summary:**

- Seed Treatment rate is 14% of the max year rate of 0.5 lb/A
- Max soil application rate is 66% of the max year rate of 0.5 lb/A
- Max foliar application rate is 62% of the max year rate of 0.5 lb/A